· 101...

30:32	1	ALAN CAVALLERANO	198
14:30:34	2	A. I consider myself to be an	
14:30:36	3	expert on the product from my readings	
14:30:38	4	of the material and my general	
14:30:43	5	understanding of the video field.	
14:30:45	6	Q. And the first time you read	
14:30:47	7	any detailed materials about the Paint	
14:30:50	8	Box was February 2006?	
14:30:52	9	A. That's correct. Sometime in	
14:30:53	10	February.	
14:30:57	11	Q. So you've been familiar	
14:30:59	12	with the details regarding the Paint	
1 31:02	13	Box for a little over three months?	
14:31:03	14	A. That's correct.	
14:31:05	15	Q. And it's your belief that	
14:31:07	16	that makes you an expert on the Quantel	
14:31:08	17	Paint Box?	
14:31:09	18	MR. BEAMER: Objection;	
14:31:20	19	asked and answered, argumentative.	
14:31:22	20	A. Again, as I said, I feel	
14:31:24	21	that I am an expert in the field of	
14:31:26	22	video, and I have a lot of familiarity	
14:31:28	23	working with different types of video	
14:31:30	24	equipment. And the Paint Box would	
	25	fall into that category, so I would	
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31:32	1	ALAN CAVALLERANO
14:31:35	2	expect that I would feel comfortable
14:31:37	3	qualifying myself as such.
14:31:41	4	Q. Do you agree that
14:31:43	5	Mr. Taylor is an expert on the Quantel
14:31:44	6	Paint Box?
14:31:44	7	A. Yes.
14:31:45	8	MR. BEAMER: Objection;
14:31:48	9	calls for speculation.
14:31:50	10	Q. Sir, I want to ask you some
14:31:54	11	questions about the Paint Box system as
14:31:57	12	sold and demonstrated in March, April
1 - 32:00	13	'82, that's the subject of Mr. Taylor's
14:32:03	14	expert report. You are familiar with
14:32:03	15	that report?
14:32:04	16	A. Yes, I am.
14:32:09	17	Q. Would you agree that the
14:32:11	18	Paint Box could receive the video from
14:32:12	19	an external source?
14:32:13	20	A. Yes.
14:32:17	21	Q. Do you agree that the Paint
14:32:18	22	Box could receive video data
14:32:21	23	representing full size images?
14:32:22	24	A. Yes.
	25	Q. Do you agree that the Paint

20.05	_		200
,32:25	1	ALAN CAVALLERANO	
14:32:28	2	Box had multiple frame stores?	
14:32:32	3	A. Yes. I know that there were	
14:32:34	4	multiple frame stores, yes, that's	
14:32:34	5	correct.	
14:32:36	6	Q. And those frame stores were	
14:32:38	7	implemented with random access memory;	
14:32:39	8	correct?	}
14:32:41	9	A. Yes, that would be typical	
14:32:44	10	that a frame store would be implemented	
14:32:45	11	that way.	
14:32:46	12	Q. And do you agree that	
1 -32:48	13	either of those frame stores could	
14:32:50	14	store a full size image?	
14:32:52	15	A. Yes.	·
14:32:54	16	Q. Do you agree that the Paint	
14:32:56	17	Box had at least one disk?	
14:32:58	18	A. Yes, I'm aware of that.	
14:33:00	19	Q. And the disk could store	
14:33:01	20	video images?	·
14:33:03	21	A. Yes, I'm aware of that.	
14:33:05	22	Q. It could store full size	
14:33:07	23	video images?	
14:33:09	24	A. Yes, it could store full	
	25	size images.	
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34:31	1
14:34:37	2
14:34:39	3
14:34:41	4
14:34:42	5
14:34:47	6
14:34:51	7
14:34:55	8
14:34:56	9
14:34:56	10
14:34:59	11
14:34:59	12
1.35:01	13
14:35:03	14
14:35:05	15
14:35:06	16
14:35:07	17
14:35:11	18
14:35:13	19
14:35:17	20
14:35:19	21
14:35:22	22
14:35:27	23
14:35:29	24

ALAN (CAVALLERANO

then reside as one composite image.

That much I am aware of, yeah.

Let's put aside for a moment what happens when you stick the image down. We will get to that. Do you agree that the Paint Box could generate reduced size images?

MR. BEAMER: Asked and answered.

- Α. Yes, as I stated, that's correct.
- Q. Do you agree that the Paint Box could automatically generate reduced size images?

MR. BEAMER: Objection;

vague.

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- Well, automatically, under control of a user going through a series of steps.
- Well, if the Paint Box browse were used to browse full size images stored on disk, didn't that browse feature automatically generate reduced size images?

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36:58	1	ALAN CAVALLERANO	
14:37:03	2	Quantel Paint Box, when it browsed full	
14:37:05	3	size images stored on disk, would	
14:37:07	4	automatically generate reduced size	
14:37:09	5	images; correct?	
14:37:10	6	MR. BEAMER: Asked and	
14:37:14	7	answered.	
14:37:15	8	A. Yes. And that in fact would	
14:37:21	9	be what a normal browse for a, let's	
14:37:23	10	say for a still store, that would be	
14:37:27	11	the normal mode of browsing. You would	
14:37:30	12.	invoke the browse and then that would	
37:30	13	occur.	
14:37:32	14	Q. So we both agree that the	
14:37:34	15	Paint Box could automatically generate	
14:37:36	16	reduced size images; correct?	
14:37:37	17	MR. BEAMER: Asked and	
14:37:38	18	answered.	
14:37:40	19	A. Yes. As I stated, it can	
14:37:43	20	reduce it can provide and generate	
14:37:46	21	reduced size images, taking images,	
14:37:49	22	full size images off the disk and	
14:37:52	23	putting them into the output frame	
14:37:52	24	store.	
. • •	25	Q. And the Paint Box could	
			į

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39:56	1	ALAN CAVALLERANO	200
14:39:58	2	generate a reduced size image that was	
14:40:17	3	a small version of the full size image?	
14:40:19	4	THE WITNESS: I'm sorry,	
14:40:21	5	could you please read back the	
14:40:29	6	question.	
14:40:29	7	(Record read as requested.)	
14:40:31	8	A. Well, as we've already	
14:40:33	9	discussed for the browse screen, we	
14:40:37	10	know that the full size image stored on	
14:40:40	11	disk can go through the size reducer	
14:40:45	12	and that that resulting reduced size	
40:48	13	image then becomes a part of a browse	
14:40:57	14	screen. And that that's a reduced size	
14:40:59	15	image that the Paint Box is able to	
14:41:00	16	create that way.	
14:41:02	17	Q. Right. So we both agree	
14:41:03	18	that the Paint Box could use its size	
14:41:07	19	reducer to generate a reduced size	
14:41:07	20	image; correct?	
14:41:10	21	A. Yes, in the way that in	
14:41:12	22	the way that I've described, yes.	
14:41:14	23	Q. And that reduced size image	
14:41:16	24	could be stored in either of the frame	
	25	stores; correct?	

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41:18	1	ALAN CAVALLERANO	۷0,
14:41:20	2	MR. BEAMER: Objection.	
14:41:29	3	A. That reduced sized image	
14:41:31	4	most certainly could be stored in the	
14:41:35	5	output frame store. And it's	
14:41:38	6	temporarily present in the second frame	
14:41:39	7	store.	
14:41:43	8	Q. And that reduced size image	
14:41:45	9	could be stored in the random access	
14:41:47	10	memory of the Paint Box; correct?	
14:41:49	11	A. Yes, that's correct, the	
14:41:54	12	frame store is the random access	
1: 41:55	13	memory.	
14:41:56	14	Q. And the reduced size image	
14:41:58	15	could be stored in one frame store	
14:42:01	16	while a full size image was in the	
14:42:02	17	other frame store; correct?	
14:42:03	1.8	MR. BEAMER: Objection;	
14:42:16	19	vague.	
14:42:19	20	A. When we say stored, it's	
14:42:21	21	stored temporarily so that it can then	
14:42:26	22	be stuck on to the output frame store.	
14:42:28	23	Q. But regardless of whether	
14:42:31	24	in your opinion it's temporary or not,	•
	25	you agree that the Paint Box could	
	,	1	!

		·	209
44:02	1	ALAN CAVALLERANO	203
14:44:04	2	anything at all can be in two separate	
14:44:07	3	frame stores, nothing is necessarily	
14:44:12	4	precluding that. But it's a matter of	
14:44:19	5	the entire operation and how that	
14:44:23	6	reduced size image got there, that's of	
14:44:25	7	significance to me with regard to my	•
14:44:27	8	analysis of that.	
14:44:29	9	Q. But you agree, sir, do you	
14:44:31	10	not, that the Paint Box could	
14:44:35	11	simultaneously store one full size	
14:44:37	12	image and one reduced size image in its	
1 44:40	13	frame stores simultaneously; correct?	
14:44:41	14	MR. BEAMER: Asked and	
14:44:42	15	answered.	
14:44:43	16	MR. SUMMERSGILL: Strike	
14:44:46	17	that. Because I said simultaneously	
14:44:48	18	twice. Let me try it again.	
14:44:49	19	THE WITNESS: Okay.	
14:44:50	20	Q. You agree, sir, do you not,	
14:44:52	21	that the Paint Box could store a full	
14:44:55	22	size image and a reduced size image in	
14:44:57	23	its frame stores simultaneously;	i
14:44:58	24	correct?	·
	25	MR. BEAMER: Asked and	

		2.	10
44:59	1	ALAN CAVALLERANO	
14:45:02	2	answered, vague.	
14:45:06	3	A. As I've stated, through a	
14:45:08	4	particular series of steps, it's	
14:45:11	5	possible to have the reduced size image	
14:45:14	6	temporarily in one frame store. And	
14:45:18	7	the full size counterpart present in	
14:45:22	8	the other, the display frame store.	
14:45:23	9	Q. Now, do you agree that the	
14:45:25	10	Paint Box could output images from disk	
14:45:27	11	to its frame stores?	
14:45:31	12	A. Yes.	
1 45:34	13	Q. And it could output full	
14:45:35	14	size images?	
14:45:36	15	A. Yes, that's correct.	
14:45:40	16	Q. And it could output images	
14:45:43	17	from disk upon a user's command?	
14:45:46	18	A. Yes, I believe that's	
14:45:46	19	correct.	
14:45:56	20	Q. Do you agree that the Paint	
14:45:59	21	Box frame stores had input ports?	
14:45:59	22	A. Yes.	
14:46:01	23	Q. Do you agree that the Paint	
14:46:04	24	Box frame stores had separate output	
	25.	ports?	

56:39	1	219
		ALAN CAVALLERANO
14:56:48	2	we know that I'm sorry, we were
14:56:50	3	talking about going from the disk to
14:56:52	4	the random access memory?
14:56:53	5	Q. I was asking you about the
14:56:56	6	transfer from size reducer to random
14:57:02	7	access memory.
14:57:04	8	A. Yes, we know that, as in the
14:57:12	9	case of the figure 19 in the I just
14:57:14	10	want to make sure, I'm just looking at
14:57:20	11	the figure. Figure 18. We know that
14:57:23	12	we have a direct transfer from this
57:25	13	is in the '776 patent, of the size
14:57:29	14	reducer to the random access memory at
14:57:30	15	the frame store, yes, that's correct.
14:57:32	16	Q. So do you agree that the
14:57:34	17	Quantel Paint Box could transfer images
14:57:38	18	directly from the size reducer to the
14:57:39	19	random access memory?
14:57:40	20	A. Yes, that's correct.
14:57:41	21	Q. And do you agree that the
14:57:43	22	Paint Box could transfer images
14:57:48	23	directly from the disk to random access
14:57:49	24	memory?
₩ .	25	MR. BEAMER: Read that back,

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1 90:17	1	ALAN CAVALLERANO	222
15:00:18	2	that the Paint Box filter card	
15:00:21	3	contained random access memory?	
15:00:21	4	MR. BEAMER: Objection;	
15:00:22	5	vague.	
15:00:24	6	A. I believe it did. I would	
15:00:27	7	need to look at the manual to be sure	
15:00:31	8	that that's the type of memory that it	
15:00:31	9	had.	
15:00:35	10	Q. Was the transfer from disk	
15:00:38	11	to the random access memory of the	
15:00:41	12	filter card a direct transfer?	
15 90:45	13	A. It's my understanding that	ľ
15:00:49	14	it would be.	
15:00:53	15	Q. Now, the Paint Box frame	
15:00:57	16	store could also output video images	
15:00:59	17	for display on the Paint Box frame	
15:01:00	18	store; correct?	
15:01:01	19	A. Yes, that's right.	
15:01:04	20	Q. The Paint Box with the use	
15:01:08	21	of its combiner, could access a reduced	
15:01:10	22	size image stored at one frame store	ŀ
15:01:13	23	and a full size image stored at another	
15:01:21	2.4	frame store simultaneously; correct?	
	25	THE WITNESS: I'm sorry,	
			ı

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07:40	1	ALAN CAVALLERANO	120
15:07:44	2	access one reduced size image and one	
15:07:46	3 .	full size image simultaneously;	
15:07:54	4	correct?	
15:07:56	5	A. Yes, as I would expect.	
15:07:57	6	Q. And you agree	
15:07:58	7	MR. BEAMER: Are you done	
15:07:59	8	with your answer?	
15:08:00	9	A. As I would expect for	
15:08:03	10	products of this nature, it most	
15:08:05	11	certainly would be possible to have,	
15:08:08	12	and I would expect, some type of a	
1 08:10	13	combiner circuit that would perform	
15:08:12	14	that type of an operation.	
15:08:15	15	Q. So that was well known in	
15:08:15	16	the art?	
15:08:17	17	A. Yes, that was well known in	
15:08:17	18	the art.	
15:08:19	19	Q. Now, you agree that the	
15:08:21	20	Paint Box had a browse feature.	
15:08:24	21	A. Yes, I'm familiar with that.	
15:08:25	22	Q. And you agree that the	
15:08:27	23	Paint Box could store multiple reduced	
15:08:31	24	size images in random access memory?	
	25	MR. BEAMER: Read that back,	
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08:32	1	ALAN CAVALLERANO	
15:08:42	2	please.	
15:08:42	3 .	(Record read as requested.)	
15:08:44	4	A. Yes, as we went over a	
15:08:46	5	little while earlier, it was possible	
15:08:49	6	to pull up full size images from the	
15:08:52	7	disk, have them go through the filter	
15:08:55	8	card and size reducer, and have those	
15:08:59	9	reduced sized images reside in an	
15:09:02	10	appropriate spot in the random access	
15:09:08	11	memory, to create a browse screen.	
15:09:10	12	Q. So you agree that Paint Box	
09:12	13	could store multiple reduced size	
15:09:14	14	images in random access memory;	
15:09:15	15	correct?	
15:09:15	16	A. Yes, that's correct.	
15:09:16	17	Q. And do you also agree that	
15:09:20	18	the Paint Box could display a mosaic of	,
15:09:31	19	reduced size images?	
15:09:33	20	A. The well, I would call	
15:09:35	21	that, what I was just describing right	
15:09:38	22	now, this array of reduced size images	
15:09:40	23	for the browse, that would be to one	
15:09:42	24	skilled in the art, one would call that	
	25	a mosaic. So yes.	-

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· \ 09:35	1	ALAN CAVALLERANO	267
16:09:36	2	Q. Sir, before the break you	
16:09:38	3	were describing the process by which an	
16:09:41	4	operator using the Paint Box could put	
16:09:45	5	a rectangle around the reduced size	
16:09:47	6	image in the frame store and save only	
16:09:51	7	the pixels corresponding to that image	
16:09:53	8	to disk; is that correct?	
16:09:59	9	A. I was referring to using the	
16:10:02	10	rectangle function to select those	
16:10:08	11	pixels which were from the which	
16:10:11	12	were from the full size image which was	
1 10:13	13	reduced and stuck on to the full size	
16:10:16	14	image to create a new composite full	
16:10:18	1 5	size image and using the rectangle	
16:10:19	16	function for that operation, yes.	
16:10:21	17	Q. When the operator places	
16:10:26	18	the rectangle over the pixels that	
16:10:31	19	represent the reduced size image, or	
16:10:33	20	what you call part of the full size	
16:10:35	21	image, only the pixels within that	
16:10:38	22	rectangle are saved to disk; correct?	
16:10:40	23	MR. BEAMER: Objection.	
16:10:44	24	A. That's my understanding.	
·.	25	Q. So assuming that you	
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00:18	1	ALAN CAVALLERANO	308
17:00:20	2	Q. And the Paint Box could	
17:00:25	3	reduce the size of those cutouts;	
17:00:25	4	correct?	
17:00:25	5	A. That's correct.	
17:00:27	6	Q. And the Paint Box could	
17:00:31	7	store those reduced size cutouts to	
17:00:31	8	disk; correct?	
17:00:34	9	MR. BEAMER: Objection.	
17:00:37	10	A. The Paint Box could store	
17:00:41	11	cutouts to disk.	
17:00:42	12	Q. And the Paint Box could	ĺ
17-00:45	13	then browse cutouts that were stored on	
17:00:46	14	disk; correct?	
17:00:47	15	A. Yes, that's correct.	
17:00:49	16	Q. And it could browse reduced	
17:00:52	17	size cutouts that were stored on disk;	
17:00:53	18	correct?	
17:00:54	19	A. Yes, that's my	
17:01:01	20	understanding.	
17:01:03	21	Well, when we say reduced	Ì
17:01:08	22.	sized cutouts, though, what we're	
17:01:14	23	talking about are cutouts. They are	
17:01:16	24	still cutouts.	
	25	Q. Well, cutouts can be	

01:17	1	ALAN CATALLEDAM	309
17:01:19		ALAN CAVALLERANO	
		reduced in size; correct?	
17:01:20	3	A. Yes, it's my understanding	
17:01:22	4	that you would be able to pull up a	
17:01:26	5	cutout and manipulate it, for example,	
17:01:28	6·	reducing it in size.	
17:01:33	7	Q. And after you reduce it in	ĺ
17:01:36	8	size, you can store that cutout to disk	
17:01:38	9	on the Paint Box; correct?	
17:01:40	10	A. That's my understanding,	
17:01:40	11	yes.	
17:01:43	12	Q. And then using the Paint	
J 01:45	13	Box browse function, you can browse	
17:01:47	14	through cutouts that are stored on	
17:01:48	15	disk; correct?	
17:01:50	16	A. Yes, that's correct.	
17:01:53	17	Q. And that's set forth in the	
17:01:59	18	Paint Box manual guide; correct?	
17:01:59	19	Strike that.	
17:02:00	20	That's set forth in the	
17:02:02	21	Paint Box user guide; correct?	
17:02:04	22	A. Yes, I have reviewed that	
17:02:07	23	document, I believe that I know that	
17:02:15	24	that is correct, yes.	
	25	Q. And as far as you know, the	
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1 12:05	1	. ALAN CAVALLERANO	318
17:12:09	2	pulling off the amount of data for	
17:12:11	3	these individual pieces.	
17:12:14	4	Q. So one of the reasons the	
17:12:20	5	Paint Box browse cutouts is faster than	
17:12:22	6	the Paint Box browse of full size	
17:12:24	7	images, is because the cutouts contain	
17:12:27	8	less data than the full size images;	
17:12:34	9	correct?	
17:12:35	10	A. Yes. Because again, what	
17:12:37	11	bogs down the system is needing to pull	
17:12:39	12	off the full size image. And in fact	!
1-12:43	13	that's what is such a benefit of the	
17:12:45	14	'121 system, where you don't need to be	
17:12:47	15	able where you don't need to pull	
17:12:50	16	off the full size image and send it	
17:12:59	17	through the size reducer each time.	
17:13:02	18	Q. Now, you agree that the	
17:13:05	19	demonstration that Mr. Taylor showed on	
17:13:08	20	his videotape could actually be done on	
17:13:10	21	the Quantel Paint Box; correct?	
17:13:13	22	A. I have no reason to think	
17:13:17	23	that an operator couldn't set up the	
17:13:23	24	steps to be able to create that to	
-	25	be able to create that effect.	
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14:05	1	ALAN CAVALLERANO	319
17:14:06	2	Q. Now, when the Paint Box	
17:14:10	3	browses full size images, the operator	
17:14:17	4	can then select one of the resulting	
17:14:20	5	reduced size images in the browse in	
17:14:22	6	order to obtain the full size image;	:
17:14:24	7	correct?	
17:14:30	8	A. We are talking about for the	
17:14:30	9	Paint Box?	
17:14:33	10	Q. Yes.	
17:14:35	11	A. Yes, that's correct.	
17:14:44	12	Q. So in the Paint Box, when	
17,14:48	13	an operator selects a reduced size	
17:14:50	14	image in the browse in order to obtain	
17:14:53	15	a full size image corresponding to that	
17:14:57	16	reduced size image, is there a working	
17:14:59	17	relationship between the browsed image	
17:15:03	18	and its corresponding full sized image?	
17:15:06	19	A. For that moment in time,	
17:15:09	20	yes. Because the full size image went	
17:15:12	21	through went through the size	
17:15:17	22	reducer and a browse screen was	
17:15:23	23	created. And then there would be a way	
17:15:28	24	to go from the reduced sized image	
	25	that's in the browse screen to, back to	

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15:30	1	ALAN CAVALLERANO	320
17:15:33	2	the full sized image. And of course	1
17:15:34	3	that's really what the prior art	
17:15:36	4	systems all allowed you to do that,	
17:15:40	5	otherwise the notion of browsing really	
17:15:43	6	wouldn't it wouldn't work, because	
17:15:46	7	then you wouldn't be you wouldn't be	
17:15:47	8	browsing.	
17:15:49	9	Q. Now, sir, we talked earlier	
17:15:54	10	about the embodiment of, Mr. Beaulier's	
17:15:56	11	embodiment of the '121 system, which	
17:16:00	12	was the ESS-3 system. Do you recall	
170,16:01	13	that?	
17:16:10	14	A. I'm not sure when we	
17:16:11	15	discussed that. Sorry.	
17:16:13	16	Q. Fair enough. We may not	
17:16:17	17	have used the term ESS-3.	
17:16:26	18	The system designed by	
17:16:28	19	Mr. Beaulier, in your expert opinion,	
17:16:29	20	maintained a relationship between full	
17:16:33	21	and reduced size images by assigning a	
17:16:36	22	number to the reduced size image that	
17:16:37	23	correlated with the number assigned to	
17:16:40	24	the full size image; correct?	
***	25	A. In a particular example, one	
	1		

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1	ALAN CAVALLERANO	341
2	intervention from the CPU."	
3	Do you see that?	
4	A. Yes, I do.	
5	Q. And Mr. Sheikh is	
6	indicating that the AVA was capable of	
7	transferring image data directly	
8	between frame store and disk; correct?	
9	A. Yes, that's correct.	
10	Q. And the advantage of doing	
11	that, according to Mr. Sheikh, is that	
12	it facilitates fast picture storage and	
13	recall; correct?	
14	A. Yes, that's correct.	
15	Q. And is it your	
16	understanding that the AVA system was	
17	capable of transferring image data	
18	directly from disk to the frame store,	
19	as Mr. Sheikh describes here?	
20	A. Yes, that's correct.	
21	Q. Now, sir, turning back to	
22	your expert report. Specifically	
23	please turn to paragraph 190.	
24	Do you have that, sir?	
25	A. Yes, I do.	
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Do you see that? A. Yes, I do. Q. And Mr. Sheikh is indicating that the AVA was capable of transferring image data directly between frame store and disk; correct? A. Yes, that's correct. Q. And the advantage of doing that, according to Mr. Sheikh, is that it facilitates fast picture storage and recall; correct? A. Yes, that's correct. Q. And is it your understanding that the AVA system was capable of transferring image data directly from disk to the frame store, as Mr. Sheikh describes here? A. Yes, that's correct. Q. Now, sir, turning back to your expert report. Specifically please turn to paragraph 190. Do you have that, sir?

01:14	1	ALAN CAVALLERANO	2
18:01:17	2	Q. Paragraph 190 discusses the	
18:01:21	3	potential of combining the AVA system	
18:01:23	4	with an electronic still store system;	
18:01:24	5	correct?	
18:01:25	6	A. Yes, that's correct.	
18:01:29	7	Q. In your expert opinion, was	
18:01:36	8	it common in the 1982 time period to	
18:01:39	9	use graphics systems, such as the AVA,	
18:01:42	10	in conjunction with electronic still	
18:01:43	11	store systems?	
18:01:47	12	A. I would say that that's most	
1901:49	13	certainly within the realm of	
18:01:52	14	possibility, to be utilizing systems	
18:01:53	15	that way, combining systems.	
18:01:55	16	Q. That was well known as of	
18:01:57	17	1982; correct?	
18:01:58	18	A. Yes, that's correct.	
18:02:45	19	Q. Sir, do you agree that the	
18:02:50	20	Ampex AVA system could generate reduced	
18:02:51	21	size images?	
18:02:52	22	A. Yes.	
18:02:55	23	Q. And the AVA could display	
18:02:58	24	reduced size images in its frame store;	
	25	correct?	

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02:59	1	ALAN CAVALLERANO	343
18:03:01	2	A. Yes, that's correct. In a	
18:03:04	3	similar way as we were discussing for	
18:03:08	.4	the Paint Box, it was possible to pull	
18:03:14	5	up images from the disk, use the	
18:03:20	6	computer to perform the size reduction,	
18:03:24	7	filtering and size reduction, and then	
18:03:27	8	reduce the image and present it for	
18:03:29	9	display.	
18:03:31	10	Q. And it could be displayed	
18:03:34	11	in the AVA frame store; correct?	
18:03:38	12	A. Yes, that's correct. And	
1003:42	13	again, this is a case of an image	
18:03:46	14	that's been reduced in size and then	
18:03:51	15	inserted into a full size image so as	
18:03:56	16	to be a composite image, what I've been	
18:03:57	17	calling a composite image.	
18:03:59	18	Q. In paragraph 166 of your	i
18:04:01	19	expert report, you indicate that the	
18:04:04	20	AVA only had a single frame store that	
18:04:07	21	could hold only a single full size	
	22	image.	
18:04:09	23	Do you see that?	
18:04:10	24	A. Yes, that's correct.	
	25	Q. You agree, do you not, that	
	ŀ		

ALAN CAVALLERANO 2 CERTIFICATE 3 STATE OF NEW YORK COUNTY OF NEW YORK 5 6 I, ERIC J. FINZ, a Shorthand 7 Reporter and Notary Public within and for the State of New York, do hereby certify: 10 That ALAN CAVALLERANO, the witness whose deposition is hereinbefore set 11 forth, was duly sworn by me and that 12 13 such deposition is a true record of the 14 testimony given by the witness. 15 I further certify that I am not 16 related to any of the parties to this 17 action by blood or marriage, and that I 18 am in no way interested in the outcome 19 of this matter. 20 IN WITNESS WHEREOF, I have hereunto set my hand this _8_ day of 21 22 LEGALINK BOSTON 23 24

ERIC/J. FINZ

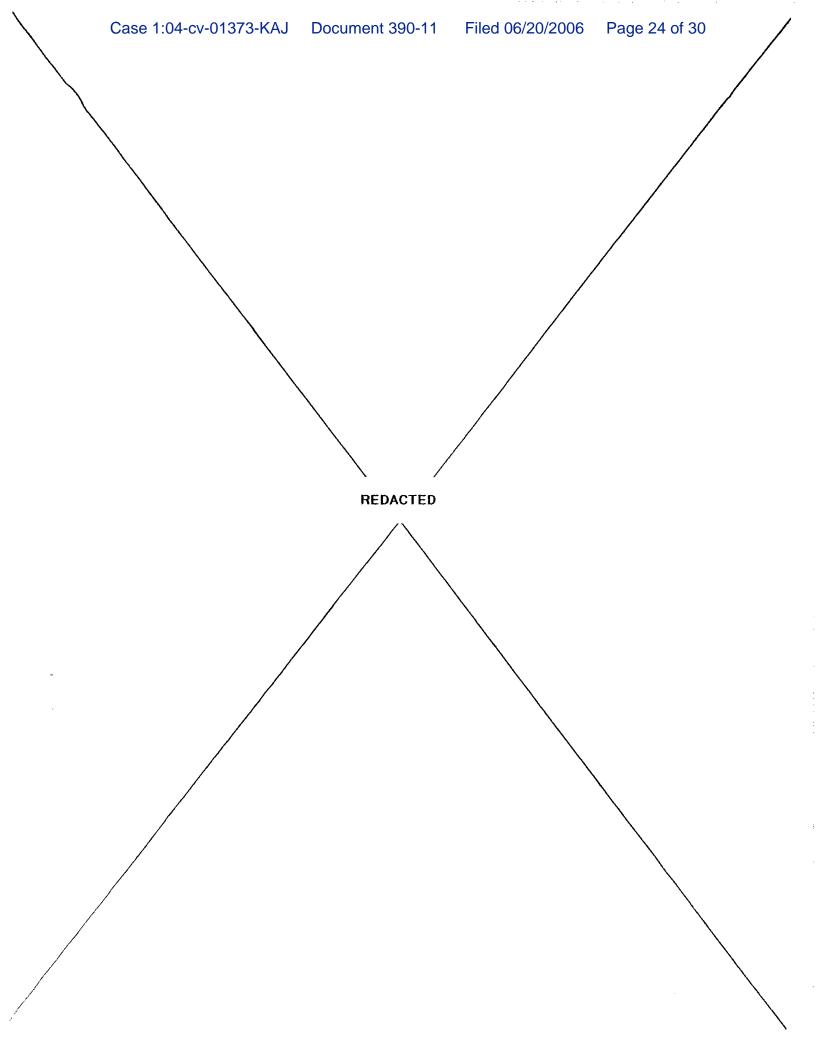
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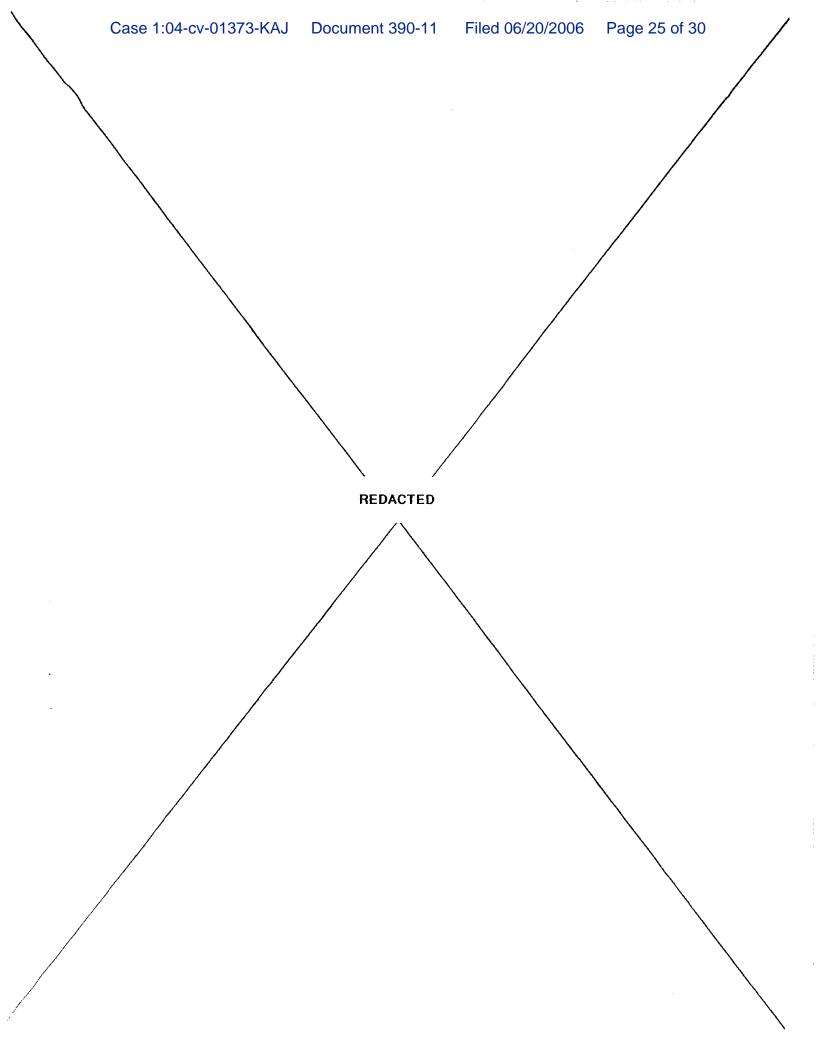
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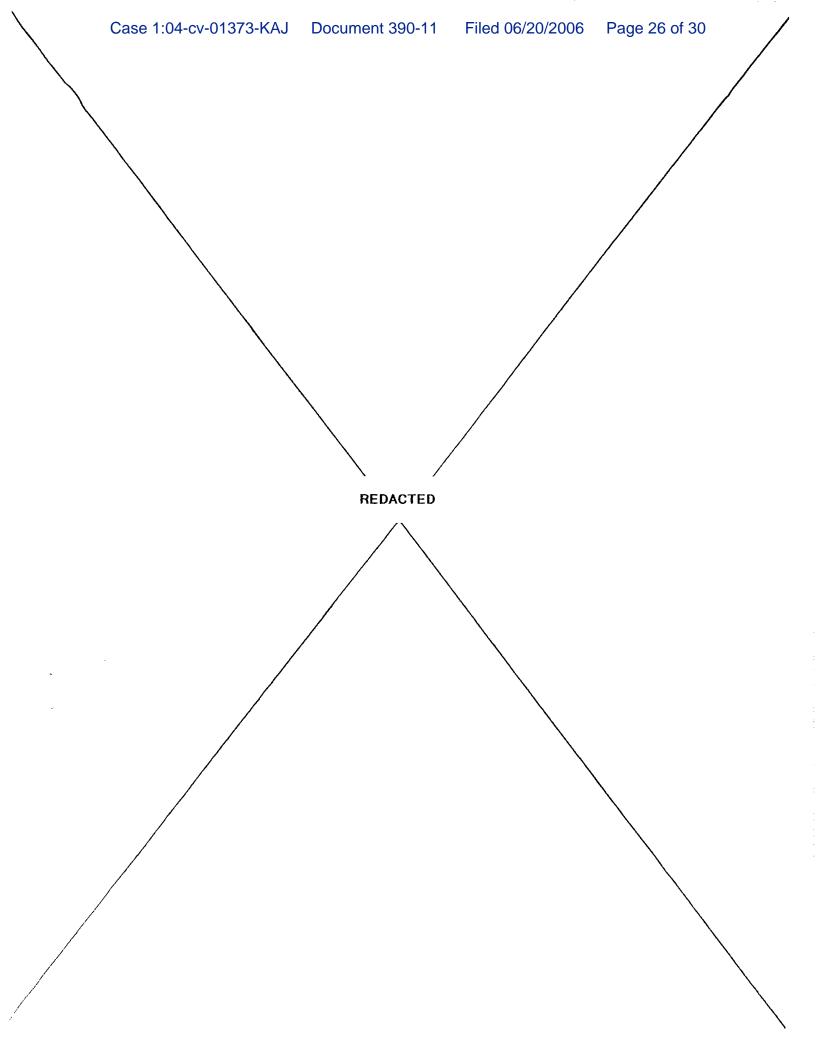
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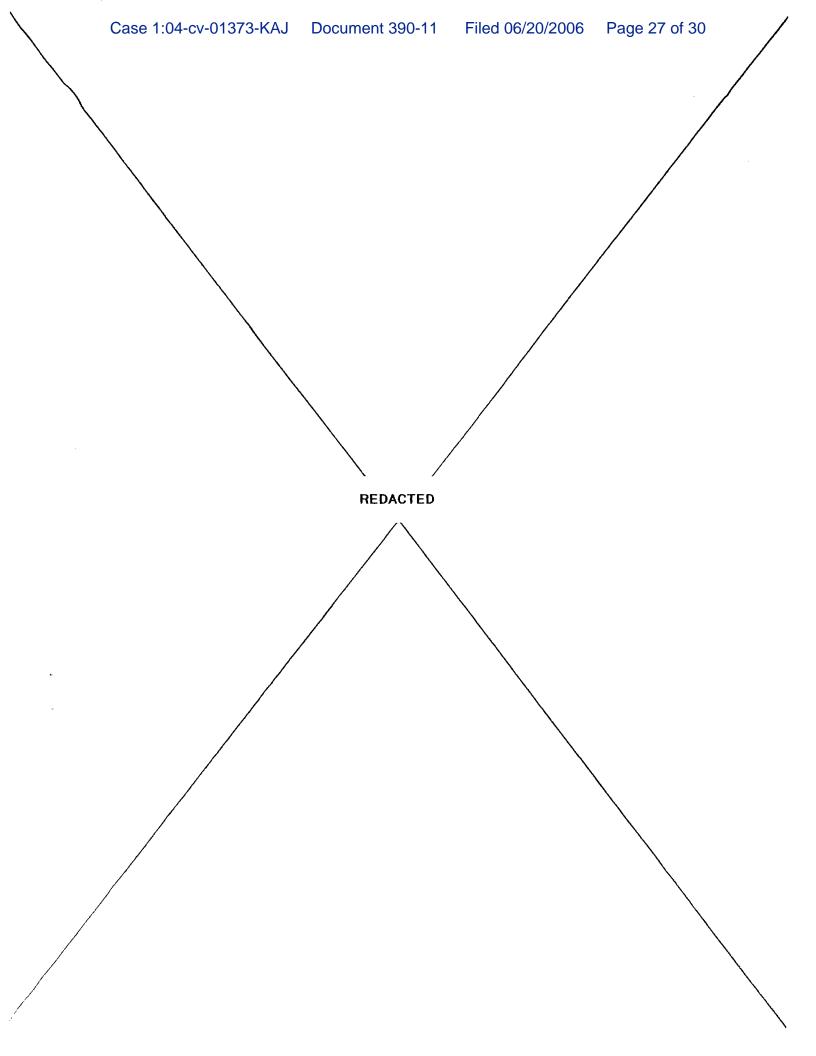
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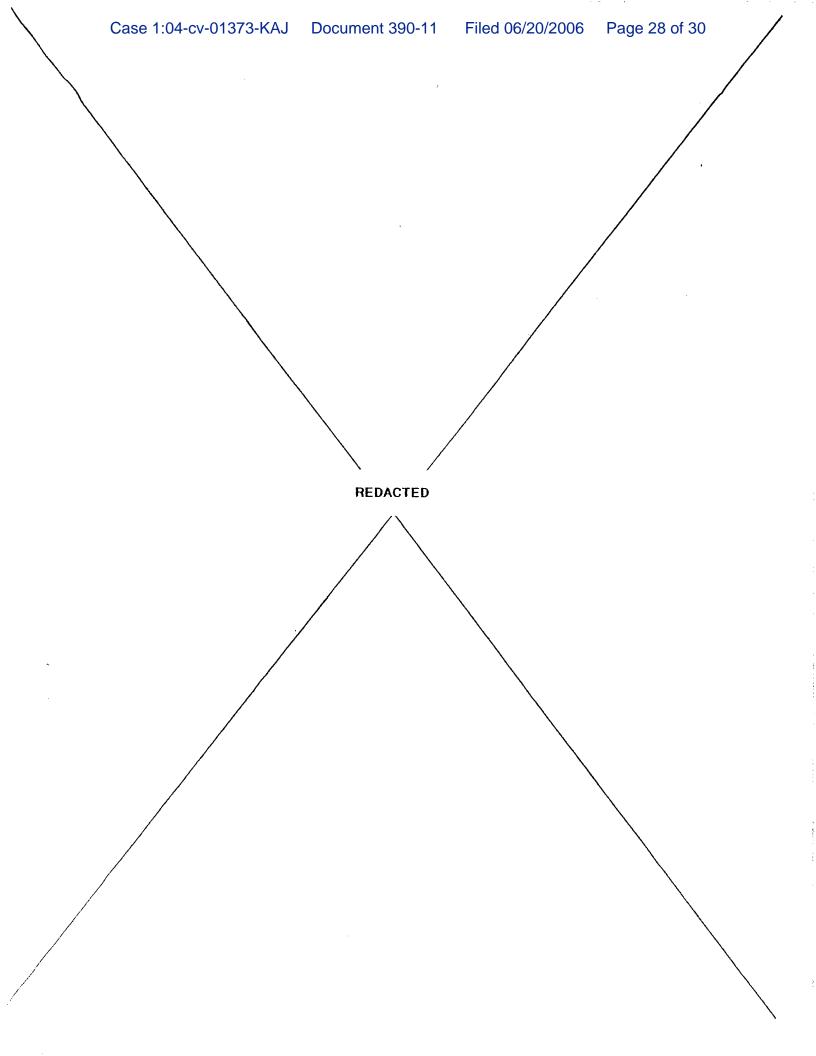
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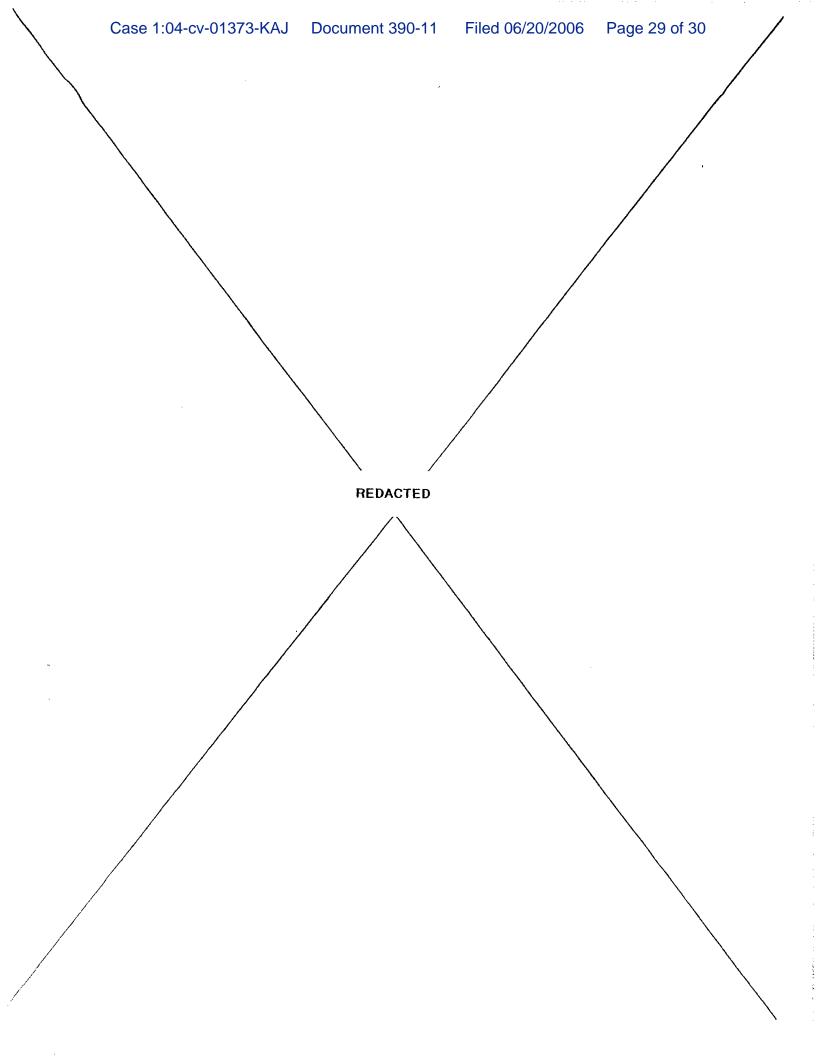












CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2006, I electronically filed Redacted Appendix to Defendants' Answering Brief in Opposition to Plaintiff Ampex's Motion for Summary Judgment that U.S. Patent No. 4,821,121 is Not Unenforceable Due to Inequitable Conduct to with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

Jack B. Blumenfeld, Esquire Julia Heaney, Esquire Morris, Nichols, Arsht & Tunnell 1201 N. Market Street P.O. Box 1347 Wilmington, Delaware 19899

and that I caused copies to be served upon the following in the manner indicated:

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